

To: The Federal Communications Commission
"From: Kent Harrison
5128 Forest Hill Avenue
Richmond, Virginia 23225
"RE: Docket MM 99-325 (IBOC Digitalization)

The radio market in Richmond, Virginia, is much like the radio market in all low to mid-size cities in America. Stations owned by Clear Channel Communications dominate that market. This includes stations on the am and fm bands. So, unless one wants to listen to nationally syndicated talk shows, Christian stations, nationally syndicated sports shows, "Disc Jockeys" that are live feeds from elsewhere, top 40 pop, so-called country, "classic rock", dance music, or screaming commercials, you have very little variety.

However, WXGI AM 950, plays real country music, has real in the studio disc jockeys, and has picked up several local sports talk shows who were dismissed by the Clear Channel -owned 910 "SportsRadio." On the FM dial, besides WCVE, the local public radio station, the only other station that you can listen to world music, jazz, alternative country, techno music, and non-top 40 new rock, is the University of Richmond WDCE, 89.5.

I am filing these Reply Comments in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, I am opposed to implementation of In Band On Channel (IBOC) Digitalization. I am concerned that IBOC could displace the frequency for which aspiring stations have applied, and many other frequencies as well. IBOC could displace both aspiring stations, and established stations as well such as I mentioned in the paragraph above.

I urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, of course, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been.

In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology.

Sincerely,

Kent Harrison